

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

**JOINT MOTION TO EXTEND THE DEADLINES FOR
EXPERT DISCOVERY AND MOTIONS FOR SUMMARY JUDGMENT**

Plaintiffs and Defendant Dexia Bank Belgium (“Dexia”) file this joint motion to extend by 12 days the deadlines for expert discovery and motions for summary judgment. In support of this motion, the parties state as follows:

1. On October 31, 2006, the Court granted the parties’ joint motion to extend the deadlines for expert discovery and motions for summary judgment, and established the following schedule for expert discovery and motions for summary judgment:

December 8, 2006: Deadline for Expert Reports Concerning any Matters for which any Party Bears the Burden of Proof.

January 16, 2007: Deadline for Rebuttal Expert Reports

February 23, 2007: Deadline for Completion of Expert Depositions

March 23, 2007: Deadline for any Motion for Summary Judgment

2. Recently, the parties have scheduled two Court-ordered depositions for December 1 and December 6, 2006. Both depositions will occur in Brussels, Belgium. Accordingly, because counsel for all parties will be in Belgium the week that opening expert reports are currently due, the parties request a short extension to the above-referenced schedule.

3. As a result of this requested extension for the deadline for expert reports, the parties submit the deadlines for expert depositions and motions for summary judgment likewise should be extended. Under the proposed schedule these cases will be on track for a pre-trial conference by mid-2007.

WHEREFORE, the parties jointly request that this Court extend the deadlines for expert discovery and motions for summary judgment as follows:

December 20, 2006: Deadline for Expert Reports Concerning any Matters for which any Party Bears the Burden of Proof.

January 29, 2007: Deadline for Rebuttal Expert Reports

March 7, 2007: Deadline for Completion of Expert Depositions

April 4, 2007: Deadline for any Motion for Summary Judgment

Dated: November 22, 2006

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**

/s/ Patrick T. Egan

Glen DeValerio, BBO # 122010
Patrick T. Egan, BBO # 637477
(pegan@bermanesq.com)
Allison K. Jones, BBO # 654804
One Liberty Square
Boston, MA 02109
Telephone: (617) 542-8300

SHALOV STONE & BONNER LLP
James P. Bonner
Patrick L. Rocco
485 Seventh Avenue, Suite 10000
New York, New York 10018
Telephone: (212) 239-4340

CAULEY BOWMAN CARNEY & WILLIAMS PLLC
Allen Carney
11001 Executive Center Drive, Suite 200
Little Rock, Arkansas 72212
Telephone: (501) 312-8500

***Co-lead Counsel to Class Plaintiffs
Hans A. Quaak, Karl Leibinger and Attilio Po***

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

/s/ Avi Josefson

Max W. Berger
Steven B. Singer
Avi Josefson
(avi@blbglaw.com)
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 554-1400

LOONEY & GROSSMAN LLP

Richard J. Grahm, BBO #206620
Charles P. Kindregan, BBO #554947
101 Arch Street
Boston, MA 02110
Telephone: (617) 951-2800

*Counsel to Plaintiffs Stonington Partners, Inc.,
Stonington Capital Appreciation 1994 Fund L.P.
and Stonington Holdings L.L.C.*

GREGORY P. JOSEPH LAW OFFICES LLC

/s/ Susan M. Davies

Gregory P. Joseph, N.Y. Atty Reg. #1645852
Susan M. Davies, N.Y. Atty Reg. #2413508
(sdavies@josephnyc.com)
805 Third Avenue, 31st Floor
New York, NY 10022
Telephone: (212) 407-1200

KOTIN, CRABTREE & STRONG

Amy C. Mainelli, BBO #657201
One Bowdoin Square
Boston, MA 02114
Telephone: (617) 227-7031

*Counsel to Plaintiffs Gary B. Filler and Lawrence
Perlman, Trustees of the TRA Rights Trust*

PARTRIDGE, ANKNER & HORSTMAN LLP

/s/ Terence K. Ankner
Terence K. Ankner, BBO #552469
(tka@anknerlaw.com)
200 Berkeley Street, 16th Floor
Boston, MA 02116
Telephone: (617) 859-9999

BOIES SCHILLER & FLEXNER

Karen C. Dyer
George R. Coe
225 South Orange Avenue, Suite 905
Orlando, Florida 32801
Telephone: (407) 425-7118

REED SMITH LLP

Alan K. Cotler
Joan A. Yue
2500 One Liberty Place 1650 Market Street
Philadelphia, PA 10103
Telephone: (215) 851-8100

*Counsel to Plaintiffs Janet Baker, James Baker,
JKBaker LLC and JMBaker LLC.*

MINTZ LEVIN COHN FERRIS GLOVSKY & POPEO

Peter M. Saporoff (BBO # 441740)
Breton Leone-Quick (BBO # 655571)
One Financial Center
Boston, MA 02111
Tel: (617) 542-6000
Fax: (617) 542-2241

CLIFFORD CHANCE US LLP

/s/ Jeff E. Butler
James W. Weidner
Jeff E. Butler
31 West 52nd Street
New York, NY 10019-6131
Tel: (212) 878-8000
Fax: (212) 878-8375

Counsel For Defendant, Dexia Bank Belgium

CERTIFICATE OF SERVICE

I hereby certify that this document will be filed through the ECF system, which filing will constitute service of the document upon all registered ECF users as identified on the Notice of Electronic Filing (NEF). A paper copy of this document has been mailed in accordance with FED. R. CIV. P. 5(b) to all those case participants not identified on the NEF as electronic recipients.

/s/ George Coe
George Coe